

Examiner's citation of pending claims in the Continuation Sheet of the Office Action as "4-6, 8-13, 55, 56, 58, 60-66, 68-73, 115, 116, 118, 120-122, 126-128, 130-135, 177, 178, 180 and 182-184" is a typographical error because the correct citation for pending claims is 4-20, 55-80, 115-122, 126-142, and 177-184.² (See Amendment with RCE dated February 8, 2007, pp. 3-34).

In the Office Action, the Examiner rejected claims 4-6, 8-13, 55-56, 58, 60-66, 68-73, 115-116, 118, 120-122, 126-128, 130-135, 177-178, 180, and 182-184 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,654,779 to Tsuei ("*Tsuei*").³ If it is the Examiner's intention to reject only the above-cited claims, Applicants respectfully request allowance of at least the pending claims 7, 14-20, 57, 59, 67, 74-80, 117, 119, 129, 136-142, 179, and 181, which were not rejected by the Examiner. Applicants' arguments herein are based on the assumption that the Examiner rejected all of pending claims 4-20, 55-80, 115-122, 126-142, and 177-184 under 35 U.S.C. § 102(e) as being anticipated by *Tsuei*. For the reasons that follow, Applicants traverse these rejections.

To properly anticipate Applicants' claimed invention, the Examiner must demonstrate the presence of each and every element of the claim in issue, either expressly described or under principles of inherency, in a single prior art reference.

² It appears that the Examiner only cited the pending claims that were rejected under 35 U.S.C. § 103(a) in view of *Goodman* and *Lockart et al.* in the Final Office Action dated December 2, 2005, but did not cite other pending claims that were rejected on different grounds in the same Final Office Action. (See Final Office Action dated December 2, 2005, p. 3).

³ To the extent that the Examiner characterizes the claims and teachings of the references in the Office Action, Applicants decline to automatically subscribe to such characterizations.

Furthermore, “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim.” See MPEP § 2121, *quoting Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Finally, “[t]he elements must be arranged as required by the claim.” MPEP § 2131, p. 2100-69. Because the Examiner has not shown that *Tsuei* discloses or teaches each and every element of each claim, the rejections under 35 U.S.C. § 102(e) are improper. For example, the Examiner’s conclusory statements “[a]s per claims 5-20, 55-80, 115-122, 126-142 and 177-184, they do not further limit the inventive concept disclose[d] in claim 4” and “their limitations are clearly taught in *Tsuei*’s disclosure” clearly fail to show that *Tsuei* discloses or teaches each and every element of all of the rejected claims. (Office Action, p. 3). Further, the Examiner without any explanation even rejects claims 20, 80, and 142 that the Examiner had already conceded are not explicitly disclosed by *Tsuei*. (See Office Action dated April 29, 2005, p. 9; Office Action dated December 2, 2005, p. 13).

Independent claim 4 recites, *inter alia*, “creating a first change of address record at the change of address server representing the change of address information,” “electronically transferring the first change of address record to a service center when the identity is valid,” “creating a second change of address record at the service center by modifying the first change of address record received from the change of address server,” “forwarding the second change of address record electronically from the service center...,” and “processing, by the forwarding service unit, the second change of address record received from the service center electronically to automatically redirect

mail....” Although of different scope, independent claims 6, 8, 14, 55, 63, 66, 68, 74, 115, 126, 128, 130, 136, and 177 recite similar features. Applicants disagree with the Examiner’s comments that all of the elements of claim 4, including the above-recited features, are disclosed in *Tsuei* at col. 3, lines 1-65; col. 5, lines 10-54; col. 6, line 6 - col. 7, line 52.

Tsuei discloses an e-mail address management system (“EAMS”) (Fig. 3; col. 6, lines 16-20). An e-mail address change may be registered with the EAMS by a recipient or by an internet service provider (“ISP”). (Col. 10, lines 12-20). Once the e-mail address change is registered with the EAMS, the EAMS may send a new e-mail address over the internet back to the sender ISP so that the sender ISP can forward the e-mail to the recipient’s new e-mail address. (Col. 10, lines 12-37). Thus, *Tsuei*, fails to disclose, among other things, “creating a second change of address record by modifying the first change of address record received from the change of address server.” Similarly, *Tsuei* fails to disclose the recited forwarding and processing of the second change of address record “to automatically redirect mail addressed to the old address of the customer to the new address of the customer.” In fact, *Tsuei* is concerned solely with email and contains nothing related to redirecting physical mail or other physical delivery items.

For at least the foregoing reasons, *Tsuei* does not disclose or teach each and every claim element recited in independent claim 4, and the other independent claims enumerated above, and these claims are allowable over the prior art of record. Similarly, dependent claims 5, 7, 9-13, 15-20, 56-62, 64-65, 67, 69-73, 75-80, 116-122,

127, 129, 131-135, 137-142, and 178-184 are allowable at least by virtue of their dependence from the allowable independent claims. Accordingly, Applicants request the withdrawal of the Section 102 rejections of claims 4-20, 55-80, 115-122, 126-142, and 177-184.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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